

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

DIRECT REPORT CORPORATION
d/b/a/ SHAREHOLDER.COM,

Plaintiff,

v.

CCBN.COM, INC., THE THOMSON
CORPORATION, JOHN DOES 1 THROUGH
5, and JANE DOES 1 THROUGH 5,

Defendants.

Civil Action No. 04-10535-PBS

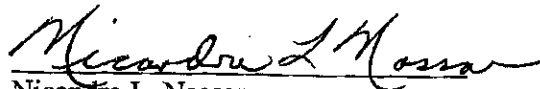
AFFIDAVIT OF NICANDRA L. NASSAR

1. I am Corporate Counsel for Thomson Financial Inc. Prior to Thomson Financial's acquisition of CCBN, I served as Corporate Counsel to CCBN. I was first retained by CCBN as Corporate Counsel in July 2002. I submit this affidavit in support of defendants' opposition to plaintiff's Motion to Compel Defendants to Designate a Knowledgeable Rule 30(b)(6) Representative and to Permit Designee to Testify to Factual Information. I base this affidavit upon personal knowledge.

2. In my capacity as Corporate Counsel for CCBN, I investigated allegations made by Shareholder.com that CCBN had accessed without authorization Shareholder computer systems. The information I subsequently learned regarding the alleged intrusions was obtained solely through confidential communications I had with CCBN employees for the purpose of rendering legal advice to CCBN.

3. Because my tenure as CCBN's Corporate Counsel did not begin until after the alleged intrusions occurred, I have no independent knowledge regarding the alleged intrusions other than the attorney-client communications referenced above.

Signed under pains and penalties of perjury this 12th day of January, 2005.


Nicandra L. Nassar

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